

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

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|---------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | No. 4:23-CR-578-AGF-NCC |
| |) | |
| v. |) | |
| |) | |
| CONNIE BOBO, |) | |
| |) | |
| Defendants. |) | |

UNITED STATES OF AMERICA’S RESPONSE
TO DEFENDANT’S SECOND MOTION FOR EXTENSION OF TIME TO FILE
PRETRIAL MOTIONS

The United States of America, through Saylor A. Fleming, United States Attorney for the Eastern District of Missouri, and Derek J. Wiseman, Assistant United States Attorney for said District, responding to Defendant Connie Bobo’s Second Motion for Extension of Time to File Pretrial Motions. *See* Doc. 31. In response, the United States of America states the following:

1. On October 25, 2023, a Grand Jury sitting in the Eastern District of Missouri returned an 8-count indictment against Defendant Connie Bobo. *See* Doc. 2. Defendant is charged with three counts of wire fraud, three counts of aggravated identity theft, and two counts of obstruction of an official proceeding. *Id.*

2. Months before the indictment was returned, on April 26, 2023, the United States provided defense counsel with a detailed reverse proffer. Shortly after the indictment was returned, the United States produced discovery to defense counsel and provided Defendant and her counsel with an additional, detailed reverse proffer presentation.

3. It is the position of the United States that there are no colorable pretrial motions to file in this matter, and—for that reason—the United States opposes any lengthy continuances of the deadline to file pretrial motions.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Derek J. Wiseman

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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2024, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Derek J. Wiseman
DEREK J. WISEMAN, #67257MO
Assistant United States Attorney